

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE and KEBE
STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

**BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

This is a diversity action commenced by Plaintiff Belcalis Marlenis Almánzar p/k/a Cardi B (“Plaintiff”) against Defendant Latasha Kebe (“Kebe”) and Kebe Studios LLC’s (“Kebe Studios”) (collectively, “Defendants”). Plaintiff moves this Court, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties’ Consent Protective Order (ECF No. 53), and Section II.J. to Appendix H of this Court’s Local Rules, for an Order permitting Plaintiff to file certain documents under seal.

This Court is permitted, for good cause, to shield the disclosure of confidential information from the public record. *See* Fed. R. Civ. P. 26(c).

“Because ‘[t]he prospect of all discovery material being presumptively subject to the right of access would likely lead to an increased resistance to discovery

requests,’ we have recognized an exception to the public right of access.” *Romero v. Drummond Co.*, 480 F.3d 1234, 1245 (11th Cir. 2007) (quoting *United States v. Anderson*, 799 F.2d 1438, 1441, n.10 (11th Cir.1986)).

On September 17, 2020, this Court previously entered the Consent Protective Order in this case providing for the filing of documents under seal. (*See* ECF No. 53.) The documents listed below contain information (i) designated by Kebe as “CONFIDENTIAL” or “CONFIDENTIAL-ATTORNEYS EYES ONLY”; (ii) that is confidential because they contain references to, or excerpts from, documents that Kebe has designated as “CONFIDENTIAL” or CONFIDENTIAL-ATTORNEYS EYES ONLY”; or (iii) from depositions and such deposition testimony shall be treated as confidential pursuant to Paragraph 9 of the Consent Protective Order because there are portions that discuss material designated as “CONFIDENTIAL” or “CONFIDENTIAL-ATTORNEYS EYES ONLY” by Kebe. To the extent Kebe wishes for the information to remain “Confidential,” it is Kebe’s ultimate burden to establish good cause for sealing. *See* Section II.J.2.e. to Appendix H of this Court’s Local Rules.

For the reasons set forth herein Plaintiff respectfully requests permission to file the following documents supporting Plaintiff’s motion for summary judgment, under seal:

1. Plaintiff's Reply Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment Against Defendant Kebe because it quotes from, references, or describes documents and testimony that have been designated as "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS EYES ONLY";
2. Plaintiff's Response to Kebe's Statement of Additional Material Facts because it quotes from, references, or describes documents and testimony that have been designated as "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS EYES ONLY"; and
3. Plaintiff's Reply Statement of Material Facts in Support of Summary Judgment Against Defendant Kebe because it quotes from, references, or describes documents and testimony that have been designated as "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS EYES ONLY."

For the foregoing reasons, Plaintiff respectfully requests that this Court grant her motion to file the documents listed above under seal.

Dated: February 8, 2021

Respectfully submitted,

/s/ W. Andrew Pequignot
Sarah M. Matz (admitted *pro hac vice*)
Gary P. Adelman (admitted *pro hac vice*)

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CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

/s/ W. Andrew Pequignot

W. Andrew Pequignot

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2021, I electronically filed the foregoing BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/ W. Andrew Pequignot

W. Andrew Pequignot